

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

Menorah Campus, Inc. *dba*

The Harry and Jeanette Weinberg Campus, et al.,

Debtors,

)

)

) Chapter 11

)

) Case No. 25-10127 (CLB)

) (Jointly Administered)

)

**RANDI DRESSEL’S OBJECTION TO THE FOUNDATION FOR
JEWISH PHILANTHROPIES, INC.’s MOTION FOR RELIEF
FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)**

Randi Dressel (“Dressel”), by and through her undersigned counsel, hereby opposes the *Foundation for Jewish Philanthropies, Inc.’s Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. 362(d)* (the “Motion for Relief”) [Doc. 184] as follows:

1. Dressel joins in the objections and oppositions filed by Sodexo Operations, LLC (“Sodexo”) [Doc. 196] and by Menorah Campus, Inc. (the “Debtor”) [Doc. 197] to the Foundation for Jewish Philanthropies’ (“FJP”) motion to lift the automatic stay so it can proceed with a foreclosure action against 471 John James Audubon Parkway, Amherst, New York (the “Property”).

2. Like Sodexo, Dressel holds a subordinate unpaid mortgage against the Property. A copy of Ms. Dressel’s mortgage, which was filed November 24, 2023, is attached as **Exhibit A**.

3. Pursuant to a settlement agreement between Debtor and to Ms. Dressel, Debtor granted Ms. Dressel a mortgage against the Property in the amount of \$854,726.57 as security for Debtor’s payment obligations to Ms. Dressel under the settlement agreement.

4. Debtor failed to make any payments under the settlement agreement and owes the full amount of the underlying debt, plus all applicable interest.

5. For the reason set forth in Sodexo's and Debtor's opposition and objection, the Court should deny FJP's motion to lift the stay as it relates to the Property.

CERTIFICATE OF SERVICE

I, Jami B. Nimeroff, hereby certify that on this 27th day of June, 2025, I caused a true and correct copy of the foregoing to be electronically filed using the Court's CM/ECF System and served upon those parties requesting service therefrom. The document is available for viewing and downloading. I further certify that I caused a true and correct copy of the foregoing to be served upon the parties on the attached Service List via electronic mail.

/s/ Jami B. Nimeroff
Jami B. Nimeroff

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